

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

NICOLE M. BRUNO

\*

Plaintiff

\*

v.

\*

Case No: AMDo3CV358

DONALD ENSTE d/b/a DANDY DONS,  
et al.

\*

Defendants

\* \* \* \* \*

**ANSWER TO AMENDED COMPLAINT**

Defendant, Donald Enste, by his attorney, Andrew B. Greenspan, pursuant to F.R.C.P. 12, in answer to plaintiff's amended complaint responds as follows:

1. Defendant is without sufficient knowledge or information with which to admit or deny plaintiff's citizenship in Pennsylvania, but admits that defendant is a citizen and resident of the State of Maryland. Defendant denies that the amount in controversy in this case will exceed the sum specified under 28 U.S.C. §1332.

2. Defendant denies the allegations in paragraph 2 of plaintiff's amended complaint.

3. Defendant denies the allegations of paragraph 3 of plaintiff's amended complaint.

4. Defendant denies the allegations in paragraph 4 of plaintiff's amended complaint.

5. Defendant incorporates answers set forth in paragraphs 1 through 4 and denies liability.

6. Defendant incorporates answers set forth in paragraphs 1 through 5.

7. Defendant denies the allegations in paragraph 7.
8. Defendant denies the allegations in paragraph 8.

**GENERAL DENIAL OF LIABILITY**

1. Defendant denies it is indebted as alleged.
2. Defendant did not commit the wrongs as alleged.
3. That unless otherwise admitted in his answer, defendant generally denies liability to plaintiff and demands strict proof as to each and every allegation and claim presented by plaintiff.

**AFFIRMATIVE DEFENSES**

1. Plaintiff's claims are barred by contributory negligence.
2. Plaintiff's claims are barred by assumption of risk.
3. Some or all of plaintiff's claims are barred by the applicable statutes of limitations.

**DEMAND FOR JURY TRIAL**

The defendant hereby demands a trial by jury as to all issues.

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ANDREW B. GREENSPAN  
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(410) 224-0045  
(410) 224-0054 (fax)

Attorney for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_\_ day of June, 2003, a copy of the foregoing answer to amended complaint was mailed, postage prepaid, to Danny R. Seidman, Esq., 80 Post Office Road, Waldorf, Maryland 20602-2709.

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ANDREW B. GREENSPAN